



NEW YORK  
REGIONAL OFFICE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
100 PEARL STREET, SUITE 20-100  
NEW YORK, NY 10004-2616

March 18, 2024

**VIA ECF**

The Honorable Judge Jesse M. Furman  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: SEC v. Mmobuosi, et al., No. 23 Civ. 10928 (JMF)**

Dear Judge Furman:

Plaintiff Securities and Exchange Commission (the "SEC") respectfully submits this letter to notify the Court of a request received this afternoon on behalf of Defendants Tingo Group, Inc. and Agri-Fintech Holdings, Inc. As the Court knows, no attorney has filed a notice of appearance to represent either Tingo Group or Agri-Fintech, but Robert Horowitz of Greenberg Traurig LLP has informally acted as an authorized representative of Tingo Group and Agri-Fintech in the proceedings to date. As reflected in the attached letter from Mr. Horowitz, Tingo Group and Agri-Fintech seek an extension of 30 days to respond to the SEC's Complaint, which would extend their deadline to respond from March 18 to April 17, 2024. The SEC does not object to Tingo Group and Agri-Fintech's request.

Respectfully submitted,

/s/ David Zetlin-Jones / Michael S. DiBattista  
David Zetlin-Jones / Michael S. DiBattista  
Counsel to SEC

Encl.: March 18, 2024 Letter from Robert Horowitz

cc: Counsel of record (by ECF)  
Robert Horowitz (HorowitzR@gtlaw.com)  
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